

## STATE OF MICHIGAN

JOHN ENGLER, Governor  
**DEPARTMENT OF ENVIRONMENTAL QUALITY***"Better Service for a Better Environment"*  
HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973INTERNET: [www.deq.state.mi.us](http://www.deq.state.mi.us)

RUSSELL J. HARDING, Director

REPLY TO:  
WASTE MANAGEMENT DIVISION  
CADILLAC DISTRICT OFFICE  
120 CHAPIN ST W  
CADILLAC MI 49601

September 13, 2000

Mr. Edgar Roy III  
Brandt Fisher Alward & Roy, P.C.  
401 Munson Ave.  
P.O. Box 5817  
Traverse City, MI 49696-5817



Dear Mr. Roy:

**SUBJECT: Williamsburg Receiving & Storage, Williamsburg**

This correspondence is written to acknowledge receipt of your letter dated September 8, 2000, which itemizes actions taken by Williamsburg Receiving and Storage (hereafter Facility), located on Munro Road in Williamsburg, Michigan, to correct violation(s) of Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act (NREPA), 1994 PA 451, as amended, and any administrative rules promulgated pursuant to this act. These violations were observed by staff of the Department of Environmental Quality (DEQ) during an inspection conducted on July 14, 2000, and the Facility was notified of these violations in a letter dated August 11, 2000.

This is to notify the Facility, that based on the information in your letter, staff of the DEQ has determined that the Facility has corrected two of the three violation(s) identified with regard to the regulations cited.

In addition, in a telephone conversation dated September 11, 2000, you indicated that the secondary containment issue may be corrected, as the brine mixing tank may be empty at this time. I am enclosing a copy of the Part 5 rules promulgated under Part 31 of the NREPA as you requested. You questioned whether containment was needed around tanks stored indoors. The violation cited in the August 11, 2000 letter, was observed where the concentrated brine is mixed outdoors. Also, a brine spill was observed at the southwest brine pits where brine had flowed out of the pit area into a ditch at the corner of Angell and Munro Roads.

The DEQ has just received an additional complaint regarding possible brine spillage from a pipeline at the Facility. The photo's that accompany the complaint show an area of dead vegetation under what appears to be a break in a temporary pipeline. I am enclosing a photocopy of the photograph. While it is more difficult to see from the photocopy, it appears that a substance leaked from the pipe and killed vegetation. If brine is transferred from the brine mixing area via the pipeline that is drained onto the ground or is subject to spills, brine containment is not adequate.

Mr. Edgar Roy, III

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Please provide documentation regarding actions taken to correct the secondary containment violations by September 30, 2000. Please include an explanation of how brine is mixed at the Facility, and transferred to and from the brine pits.

This determination does not preclude nor limit the DEQ's ability to initiate other enforcement action, under state or federal law, as deemed appropriate.

If you have any questions, please contact Ms. Janice Heuer at 231-775-3960, extension 6203, or myself at the number below.

Sincerely,



Philip Roycraft  
District Supervisor  
Waste Management Division  
231-775-3960 Extension 6200

cc: Mr. Chris Hubbell Williamsburg Receiving and Storage, Inc.  
Ms Maureen Kennedy, Grand Traverse County Drain Commissioner  
Mr. Ross Childs, Grand Traverse County Administrator  
Mr. Tom Weston, MDEQ-WMD, GWPS  
Mr. Rick Rusz, DEQ-WMD, Enforcement Section  
Ms. Sy Vongphasouk, DEQ-SWQD, Cadillac  
Ms. Janice Heuer, DEQ-WMD, Cadillac